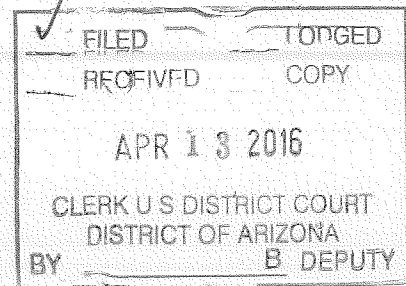


James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com



**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

JAMES OLIVER ROMINE JR. Plaintiff v. JAMES NICHOLAS STANTON Defendant	Case No.: 2:16-cv-00604-JJT AMENDED COMPLAINT 1 FOR CIVIL ACTION PERSONAL INJURY VIA LIBEL PER SE AND LIBEL PER QUOD TRIAL BY JURY: No
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THE PARTIES TO THIS COMPLAINT

A. The Plaintiff

Name James O. Romine Jr.

Street Address 12494 Ironwood Dr.

City and County Yuma, Yuma County

State and Zip Code Arizona 85367

Telephone Number 928-276-1844

E-mail Address jromine2445@gmail.com

B. The Defendant

Name	James Nicholas Stanton
Job or Title	Game Journalist - The Jimquisition.com
Street Address	1004 Riverchase North Dr.
City and County	Brandon, Rankin County
State and Zip Code	Mississippi 39047
Telephone Number	601-331-4858
E-mail Address	<u>MorphineJim@gmail.com</u>

C. Attorney for Defendant

Name	Bradley P. Hartman
Job or Title	HARTMAN TITUS PLC
Street Address	7114 E. Stetson Drive, Suite 205
City and County	Scottsdale Maricopa
State and Zip Code	Arizona 85251-3250
Telephone Number	(480) 659-0019
E-mail Address	<u>bhartman@hartmantitus.com</u>

JURISDICTION AND VENUE

☐ Federal question

☒ Diversity of citizenship

1. The Plaintiff, James Oliver Romine Jr is a resident of the State of Arizona and a Citizen of the United States.

2. The Defendant, James Nicholas Stanton, a United States Person and is currently a resident of Brandon, Mississippi. It is uncertain at this time if The Defendant is a Citizen of the United States. The US District Court of Arizona has Jurisdiction and Venue over The Defendant for the following reasons:

a. International Shoe Co. v. Washington, 326 US 310 (1945)

supports: The Defendant sells merchandise which he profits from in the State of Arizona through online sale. The Defendant with these sales, establishes minimum contact requirements.

b. International Shoe Co. v. Washington, 326 US 310 (1945)

supports: The Defendant charges a minimum \$1 subscription fee per month from subscribers to The Defendants Patreon.com of

which there are almost 4000 subscribers some of which are

in The State of Arizona causing continual periodic financial

contact with the State. The Defendant with these sales, establishes

minimum contact requirements.

- d. According to *Calder v. Jones* 465 US 783 - Supreme Court 1984, The Defendant has directed damaging statements at The Plaintiff causing in excess of \$2,000,000 damages to the damage Plaintiff, an Arizona resident. Jurisdiction and Venue are legitimate due to these facts. The Defendant knew or should have known that the statements would cause damage and that such damage would occur in Arizona. This damage was not incidental or remote from the business of The Defendant.
- e. 42 U.S.C. § 1985 section 3, states that if 2 or more persons depriving persons of rights or privileges, in this case right of due care and right of not being subject to others bearing false Witness. If those two or more persons in any State or Territory conspire on the highway (Internet) for purpose of depriving equal protection under the law, the person injured by those conspirators have right to recover damages caused by such interference.
- f. 28 U.S.C. § 1332 provides that in excess of \$75,000 in damages

and the parties are of different states that the US District Court of Arizona has jurisdiction over the state court system.

These facts instill that The Defendant has personal jurisdiction within the State of Arizona. The defamatory statements reach into the State of Arizona directly aimed at The Plaintiff. The Defendant advertises his Patreon site through his Youtube and other media outlets which is visible to viewers inside the State of Arizona and this advertisement and financial contact directly leads viewers in Arizona to the libelous statements involved in this case. Both Patreon.com's (a) and Shark Robot LLC's (b) are used as distribution and subscriber based financial instruments within The State of Arizona. The damage depicted below is market evaluated according to average provable product value at the time of The Defendant assaulted the Plaintiff.

3. The Amount in Controversy:

Direct Product Damage: \$4,248,775. (possible adjustments see Relief)

Emotional, reputational, and financial distress: \$5,250,000

Punitive damage request: \$6,000,000

Total: \$15,498,775.

COMPLAINT

1. According to 28 U.S. Code § 4101 and 42 U.S.C. § 1985 section 3: When The

Defendant falsely accused The Plaintiff and caused damage to reputation, damage to product, loss of product, and causing severe emotional distress to The Plaintiff, The Plaintiff has right to receive restitution for these damages. The statements that have been made on the Internet by The Defendant have resulted in criticism, condemnation, and further false accusations by the public towards The Plaintiff. These statements have been made in reckless disregard for duty of care that all United States Persons are legally required to follow. In this Complaint, thejimquisition.com article:

<http://www.thejimquisition.com/2015/09/digital-homicide-and-the-case-of-the-sockpuppet-developers/> where portions of the Libel Per Se occurred will be referred to here forward as The Article. For the purposes of this Complaint, The Defendants twitter feed at <https://twitter.com/JimSterling> will be referred to as Tweeted. The Plaintiff's business partner Steam/Valve Corporation will be referred to here forward as The Distributor. Evidence for all information contained in Items 1 through 38 are available even if they have been removed from the Internet at this point.

2. The Plaintiff took direct damage through the use of his personal name via multiple postings of false statements in regards to claims of impersonation of ECC Games, a Polish Company based out of an apartment in Poland, on twitter.com and thejimquisition.com by The Defendant. The products and advertising lost to The Plaintiff exceeds \$2 million in market value at the time of damages. The products are listed as Operation: Vile Strike, MAS, Assault on

Orion 7, Coastal Carnage, Bombing Run, ELT, Grimmezh's Journey, Hover Tank Attack, Primate, Starship: Nova Strike, and two pack/bundles that could have been formed with these games. Their forced removal can be shown on Oct 13th 2015 on greenlightupdates.com which tracks greenlight submissions and removals. See Attachment A. Primate was hidden prior to the damages caused and then was forced to be removed at the same time as the other titles. This cannot be seen on greenlightupdates.com as the item was hidden. See damage adjustment bullet in the Relief section at the bottom of the Complaint.

COUNT 1 LIBEL PER SE

3. **Libelous Statement**: On September 24th, 2015, The Defendant states "It's also worth noting that Galactic Hitman's artwork has been taken from elsewhere, just like the initial art for The Slaughtering Grounds was. You can see the original imagery here". The last sentence being a link to Deviant Art Galactic Hitman image. This suggests that The Plaintiff's Slaughtering Grounds image was also taken from Deviant Art. See Attachment B.
4. **The Plaintiff Asserts**: The Article falsely states that The Plaintiff intentionally used an image that The Plaintiff did not have rights to. A link is provided to Deviant Art. The initial Slaughtering Grounds art was not taken from this site. This can be seen as a separate accusation of theft by The Defendant from The Galactic Hitman Image. It was a free upload to a wallpaper site and was free to use and modify, which when it was discovered within 24 hrs that the artist did

not have full rights to put it up for free use, it was immediately removed. The original artwork received 40 thousand free views of traffic and when The Plaintiff attempted to contact the artist there was no response.

COUNT 2 LIBEL PER SE

5. **Libelous Statement:** On September 24th, 2015, The Defendant states in The Article: “It’s also worth noting that Galactic Hitman’s artwork has been taken from elsewhere, just like the initial art for The Slaughtering Grounds was. You can see the original imagery here, which Faker-ECC may have purchased from Shutterstock. Does DH even have a single artist?” See Attachment B.
6. **The Plaintiff Asserts:** . The original statement has been modified yet still implies that The Plaintiff has not paid for the use of this material after The Defendant was specifically told in an interview that images are licensed through Shutterstock. The Defendant did not ask for a receipt, made no attempt to contact The Plaintiff or his partner prior to initial posting of the defamatory material. The Defendant did not make effort to verify facts and has done so in reckless disregard for duty of care.

COUNT 3 LIBEL PER SE

7. **Libelous Statement:** On a date between September 24th and September 26th, 2015, The Defendant placed a modification to The Article that states: [Note: Initially I suggested Digital Homicide just took the image from a Deviantart artist

without permission, not knowing it was also sold on Shutterstock. The text has been edited to reflect this.] See Attachment B.

8. **The Plaintiff Asserts:** The Defendant posted this insufficient modification even though The Defendant had been told twice at this point, once in an interview and once by phone shortly before the above modification, that the Plaintiff did not steal either image but the damage especially in context with the rest of The Article and can be seen in the comments section. No apology, no proper retraction, and no special attention is given. Receipt is included in Attachment C. Image of download is included in Attachment D. The Defendant was previously notified on July 2nd 2015, where all artwork the Plaintiff purchases almost 3 months prior to the false statements in this complaint regarding theft and The Defendant did not even take the time to attempt to locate the image before posting the false statements (this is possible to do within a few minutes with Google Image search). Negligence is plainly shown here: “not knowing it was sold on Shutterstock”. The Defendant had been told twice where the material came from and still fails to properly retract. The receipt in Attachment C was the second large subscription purchased out of six subscription licenses. Download dates show the last time the image was downloaded not the first.
9. The effects of these statements in Counts 1 through 3 can be seen with the first publishing of a Greenlight item from the time of the Incident causing the Action of this case. See Attachment E. Discussions 4 and 11 are postings of The Defendant’s videos by The Defendant’s subscribers on The Plaintiff’s product

which gains The Defendant subscribers, ad revenue, and spreading damage to The Plaintiff. Discussions 7, 9, 14, and 16 are accusations of theft by The Defendant's subscribers. Discussion 12 is an accusation of viruses existing in The Plaintiff's product even though no such virus exists.

COUNT 4 LIBEL PER SE

10. **Libelous Statement:** On September 24th, 2015, the Defendant states in The Article: "Here, we've seen it lead to potential legal trouble for the folks who rebranded and accidentally defamed a completely different studio." See Attachment F.
11. **The Plaintiff Asserts:** The Defendant claims The Plaintiff has defamed a studio which is false and tarnishes The Plaintiffs good name. The negative reputation The Plaintiff has is from The Defendant's actions and The Defendant's portrayal of The Plaintiff in articles and videos. Every Click Counts, the Trade Name of The Plaintiff was plainly visible on the developer account since its creation here: <https://steamcommunity.com/profiles/76561198219137364>. In Attachment G it can be seen that as soon as The Plaintiff contacted ECC Games Poland/Eccentricity Games and The Plaintiff changed the name to be more clear and avoid any confusion this however occurred after defamatory comments were made and magnified by The Defendant. The Image in Attachment G has been there and on The Plaintiff's Every Click Counts Facebook page since creation on March 23 2015. The Plaintiff offered to clarify this name even though ECC

Games Poland had no legal registration in any US State nor any official Trademark with the USPTO. Attachment I first paragraph shows the statement by The Defendant from The Article. In Attachment H can be seen a different company created in New Jersey in 2009 called Eccentric Games LLC. The Plaintiff asserts that the ECC Games name is a malformed usage of an abbreviation that applies to many possible acronyms and abbreviations. A single contact with The Plaintiff was all that was required to clarify this prior to public statements and damages done. The Plaintiff would happily have performed actions for clarity. The Defendant maliciously desired to use ECC Games (Poland) malformed name as a tool to direct damage and controversy at The Plaintiff for personal profit to The Defendant.

COUNT 5 LIBEL PER SE

12. **Libelous Statement:** On September 24th, 2015, The Defendant states in The Article “Apparently you don’t need to prove your company’s legitimacy or even existence, since it’s all based on usernames.” See Attachment I, first paragraph.
13. **The Plaintiff Asserts:** The Defendant’s statement is misleading and portrays false light on The Plaintiff. The Defendant himself is not incorporated in anyway that The Plaintiff can find in records. It is believed Defendant himself is using Trade Names - Jim Sterling and The Jimquisition. The Defendant makes the above statement in a negative way to make it seem to his audience that normal business practice is somehow being abused. This does significant credibility

damage to The Plaintiff in the eyes of the gaming public, The Distributor, and peers as these users came and blamed The Plaintiff on The Plaintiffs active store page forums on The Distributor's site. Hundreds of thousands of users use Trade Names across the net to sell their goods, on The Distributor, Amazon, Ebay, and tens of thousands of other sites. Every user on The Distributor can use their Steam Account as a Trade Name account to trade cards, and virtual goods to other users or sell them. Many of these virtual goods cost more than The Plaintiff's games.

COUNT 6 LIBEL PER SE

14. **Libelous Statement:** On September 24th, 2015, the Defendant states in The Article: "It (The Polish ECC Games) also has a Twitter account which, prior to now, has no history of mentioning either Devil's Share nor Galactic Hitman". See Attachment J.
15. **The Plaintiff Asserts:** The games Devil's Share and Galactic Hitman were branded under Every Click Counts. At no time did The Plaintiff attempt to imitate ECC Games. There were no links to Polish ECC Games websites, no links to its games, and no use of any of its developers or workers names. ECC Games Poland is using an abbreviation for Eccentricity (which was even shown at the bottom of their webpage until recently deleted) and has no legal business formation in the United States via Trademark nor US State Business Registry. No contact was attempted to the Plaintiff prior to posting of the defamatory material

that caused the damages stated. The material was posted to purposefully cause controversy, damage, and portray The Plaintiff as having done something illegal. See Attachment K, now. See Attachment L, previous to January 2016. ECC Games Poland has a greenlight game Tower Dwellers submitted under steam user name piotr wat a combination of ECC Games Poland/Eccentricity Games CEO's first and last name. The game is not labeled under the name ECC Games Sp. z O.O. nor Eccentricity Games and has been sitting in The Distributors submission system approved for over a year and a half. ECC Games Poland/Eccentricity Games distributes its titles under Chillingo by Electronic Arts and Noodlecake Studios to attract attention to their mobile products. The Plaintiff asserts that ECC Games does not have any significant notoriety in the PC Distribution Market that would give any cause to imitate. Proven sales stats will be submitted in a sealed report called The Steam Market Evaluation Report showing almost exactly the same sales between two different Trade Names Every Click Counts Games and Micro Strategic Game Designs that occurred within a week of each other selling on exactly the same market at the same price with nearly identical results (less than 5% sales deviation). The explanation of how this market works and why it would not matter who was even selling the product is also included in The Steam Market Evaluation Report Exhibit to be filed under seal.

COUNT 7 LIBEL PER SE

16. **Libelous Statement:** On September 24th, 2015, the Defendant states in The

Article: “chicanery may lead it into very real legal trouble”. See Attachment I last paragraph.

17. **The Plaintiff Asserts:** This statement is false as there was no attempt to impersonate another company. The usage of “chicanery” defines The Plaintiff as using “trickery, deception, deceit, underhandedness, and fraud”. The company supposedly (ECC Games) impersonated is incorporated in Poland and has no legal right to that name in the United States as they are not registered in any US State and have no official Trademark registered with the USPTO. It would have been legally open for usage in The United States had The Plaintiff intended on doing so. A generic Madrid Protocol registration was registered as “Roll in the hole” on 2012-10-09 by ECC Games CEO Piotr Watrucki. Attachment M displays this information. There is no WIPO entry for ECC Games nor Eccentricity Games. The name ECC Games was recently switched to from Eccentricity Games at the beginning of 2015. A recent redirect from an Eccentricity facebook page to ECC Games, and the ECC Games profile on LinkedIn has the account name of Eccentricity.

COUNT 8 LIBEL PER QUOD

18. **Libelous Statement:** On September 24th, 2015, The Defendant states in The Article: “Being as sly as the Wet Bandits”.
19. **The Plaintiff Asserts:** The Defendant is comparing The Plaintiff to an incompetent thief (reference to the movie Home Alone). In context with the

accusations of stolen images and wrongdoing of corporate name impersonation further tarnishes The Plaintiff's reputation. See Attachment I third paragraph.

COUNT 9 LIBEL PER QUOD

20. **Libelous Statement:** In The Article the Defendant states using Romino three times "is listed as belonging to the notorious Romino brothers."
21. **The Plaintiff Asserts:** When not using the Plaintiff's given name, The Defendant often uses a modification to the Plaintiff's last name as "Romino" attempting some form of relation to a mob or mafia family - a criminal reference. This is done in many locations and videos as well as the three times in The Article. In context with the false accusations of stolen images and wrongdoing of corporate name impersonation further tarnishes The Plaintiff's reputation. The Article will be filed as an Exhibit of Evidence showing these three statements.

COUNT 10 LIBEL PER SE

22. **Libelous Statement:** On September 24th, 2015, The Defendant Tweeted a link: "I wrote an article on everything we know about the Digital Homicide / ECC Games weirdness." See Attachment N.
23. **The Plaintiff Asserts:** As this statement is made on a different media outlet and directs 122000+ users to false statements in The Article it is a separate count of

defamation.

COUNT 11 LIBEL PER SE

24. **Libelous Statement:** On September 24th, 2015, The Defendant Tweeted:

“According to the email, this ECC Games is pursuing legal action against Digital Homicide for using its name. Not enough popcorn on Earth.” See Attachment O.

25. **The Plaintiff Asserts:** No legal action was ever taken as there were no bounds for them and the media actions used to portray this situation in a negative way that has directly damaged The Plaintiff. This statement shows the false statements as entertainment for The Defendants viewers so that The Defendant can profit from it via view advertisements and subscriber generation. The Defendant’s action spread the original defamation from the original ECC Games Poland post from less than a 100 Twitter followers to over 120 thousand. The added comment makes it his own and it is restated in thejimquisition.com article. There is no discernible difference between the Plaintiff and Every Click Counts Games, Faker-ECC as described by The Defendant, or Digital Homicide Studios LLC due to The Defendant’s continual usage of The Plaintiff’s good name on Youtube videos and articles over the past year. The games lost were under the Every Click Counts Trade Name and other Trade Names representing The Plaintiff directly.

26. The Defendant makes profit from subscribership and ad revenue and is monetarily motivated to provide controversial topics especially about The

Plaintiff. The Plaintiff has been the target of a large percentage of the Defendant's materials, more than most of the Triple A multi-million dollar game companies currently subject to The Defendants attacks.

27. The Plaintiff's Trade Name logo plainly displayed Every Click Counts and it can even be plainly seen in one of the Defendants videos shortly after the defamation occurred. Link for Primate provided:

https://www.youtube.com/watch?v=_weZ2cXeswA The pasting of the logo is seen now over the thumbnail of the video this was changed with no explanation as to why after a majority of traffic already hit the video and the damage was done. This image was placed there weeks to months after the majority of viewers had already seen the video. See Attachment P. This is provided as evidence only and the contents of the video are not being disputed in this case. The Plaintiff does not have the legal or financial backing to make contest against The Defendant's billion dollar Multi-channel network partner which is in competition with The Plaintiff on The Distributor's platform.

COUNT 12 LIBEL PER SE

28. **Libelous Statement:** On the 24th of September, 2015, The Defendant Tweeted:

"Jesus Christ, I just got an email from ECC Games saying they're NOT the ECC Games Digital Homicide named itself after. This is weeeeird." See Attachment Q.

29. **The Plaintiff Asserts:** The Defendant is acting shocked here to make it seem as if The Defendant has discovered something - when in fact not enough research

has been performed and no attempt to contact The Plaintiff has been made. The Plaintiff legally used a Trade Name and did not attempt to imitate a foreign company that had no registered rights in the United States. The Every Click Counts image has been on the developer account since its creation March 23rd, 2015 and can be seen on The Plaintiff's Every Click Counts Facebook Page. This statement was made two weeks after ECC Games Poland followed The Defendant on approximately September 9th 2015 on Twitter. The Plaintiff alleges this fact shows prior communication with no attempt to contact The Plaintiff with up to 2 weeks of time to do so.

30. Three days after almost destroying The Plaintiff, The Defendant finally asks The Defendant's subscribers to stop harassing others when The Plaintiff's partner had asked The Defendant to do this three months prior. The Defendant essentially posts his material the viewers see it and immediately form a riot/witch hunt where the subscribers go and attack the particular products store page. These attacks destroy and/or reduce community, value, and product.

COUNT 13 LIBEL PER SE

31. **Libelous Statement:** The date of this comment below cannot be seen as it has now been deleted. Evidence was saved in a screenshot. On The Defendant's ask.fm/jimquisition channel, The Defendant states "Yeah it was, because Digital Homicide is more than just a bad developer. It's had a history of shady and dishonest behavior, behavior it was continuing under its new name. The very fact

it was damaging the reputation of another company is entirely bad enough, to say nothing of its continued efforts to push games through Greenlight via unscrupulous means. I will not deny the pleasure I take in sticking it to them, but their name is mud for a reason, and people deserve to know who's really selling them products." See Attachment R.

32. **The Plaintiff Asserts:** This statement assists in defining the malicious intent of The Defendant. This statement has been deleted from ask.fm/jimquisition channel sometime between December 2015 and January 2016 over 3 months after it was posted. The Plaintiff's 'name being mud' is only through The Defendant's repeated videos, articles, and statements on Twitter. The Plaintiff contacted a lawyer in Phoenix asking about company representation. That lawyers office had represented over 4400 businesses showing common practice not having a owner's name directly associated to a business facing the public for privacy purposes. The Defendant's statements continually magnified minor user problems that every Developer has on The Distributor's platform and turns them into an all out barrage of attacks. The 'shady behavior' is referring to Keys for votes, the day The Plaintiff was almost Destroyed by The Defendants Twitter and Article statements a game called "Suits" was admitted through greenlight having given 25000 keys away for vote traffic just a week prior and hundreds of game companies use keys as promotional and marketing devices, it is a commonly used method of advertisement. The Defendant's 'shady behavior' statement is also The Plaintiff simply attempting to rebrand to avoid harassment caused by

The Defendants media outlets. The statement that The Plaintiff is damaging the reputation of another company is false and maliciously negligent without regard for the truth. Deletion of the comment shows intent to cover the facts of the aggressive act without any regard for the damage it has done. Screenshot image is included in Attachment R. Two other screenshots are also available of this material which are admissible per Title 28 Rule 1003 as they are a contributing Count to this cause of action. Harassers guided by The Defendant and The Defendant attacked The Plaintiff repeatedly from November 2014 through to this day and forced The Plaintiff to attempt to rebrand. Then The Plaintiff was made to look as if doing something illegal when doing so just to try to work in peace. All products can be refunded if the customer is not satisfied. All but one product (the newest) is under 3 dollars with most being a dollar. A majority go on sale for less than .50 cents. Cost of ownership is extremely low and some individuals even profit off of the game purchase through game card sales (cards are similar to baseball cards but virtual goods). In Attachment S can be seen an email from a Greenlight web advertiser orlygift.com. There are many companies such as this which generate traffic to Greenlight submissions in the manner The Defendant is portraying as 'shady'. Only gifts offers up to 5 thousand votes worth of traffic for 300 pounds to get a game through the Greenlight submission process. The Distributor controls over 70% of the Digital Distribution PC game market and is the only reasonable place to sell digitally distributed games in a profitable fashion. Greenlight submission is the only way to make it onto The Distributor

without full appid approval given primarily to large publishers, AA, and Triple A companies. The only way to compete with others is to generate enough traffic to your submissions and the huge amount of subscribers The Defendant directs at The Plaintiff's products continually slows down the ability of The Plaintiff to compete in the market. No votes do not count as much as yes votes but they can affect your percent and entry time to market significantly. In essence The Plaintiff has to market significantly more to sell The Plaintiff's products due to The Defendant's coverage and previous coverage of The Plaintiff's products that has generated hate and dislike for The Plaintiff. Constant quotes of "Jim Sterling" The Defendant's alias and links to videos can be seen over 2 thousand times across all of The Plaintiff's products, in posts, reviews, and comments. While causing damage to The Plaintiff this simultaneously creates advertisement and profit for The Defendant. There are a dozen more examples of maliciousness available on The Defendant's videos and articles including one stating "have you guys(The Plaintiff and his partner) ever seen bollocks before, I mean I've had mine in your mouth for a long time" seen here at 3:55 through 4:10 - <https://www.youtube.com/watch?v=LV2krWfHC6E> , as seen by over 80 thousand viewers.

33. Attachment T and U show that even though The Defendant is aware of the damage being done to his video targets especially after the results on The Plaintiff, The Defendant continues to perform the same actions as this complaint is being finalized. See Attachment V. On 2-15-16 The Defendant posted another

resulting in a heavy assault on that products store page where users accuse theft and harass the developer of that product relentlessly. There are dozens of examples similar to Attachments T and U available on The Distributors submission system with many products destroyed immediately by harassment that ensues. At the end of The Defendants video he encourages his viewers to investigate and they have accused that Cat Simulators developer of theft with improper investigation into the source of the products used and assumptions stated as facts rather than actual researched facts. Video link:

<https://www.youtube.com/watch?v=19ch-cbnNts>. This has been commonplace over the past year and a half. A video will be made according to The Defendant's decision on that product, the subscribers will obliterate that products store page with harassing comments sometimes filtering over into reviews. The first time The Plaintiff saw this happen in person was on the release of The Slaughtering Grounds released on 10-31-2014, The Plaintiff's second team work product on The Distributor.

34. Many of the The Defendant's subscribers are fanatical, young, and impressionable. These subscribers are easy to mislead and The Defendant specifically states on Youtube that The Defendant knows The Defendant can do so at time 15:30 to 16:00 minutes into the video below The Defendant States: "But if there is one thing I have learned about game journalism, it's that you can pretty much say anything about anything, and ahh, people will swallow it, you just ascribe some sort of artistic meaning to things, whether that was the intention

or not, someone will believe you.” Link Provided:

<https://www.youtube.com/watch?v=Wa02mXimzqk>.

35. The day after being served with the summons for this case, The Defendant posted another video covering The Plaintiff’s current Greenlight Submissions as The Plaintiff work’s towards recovery from the damages done

<https://www.youtube.com/watch?v=ZoNDahSe5J4>. A Resulting 5% to 20% vote damage, 52 invalid user reports on the secondary video target all of which occurred within a 3 day span after the video was posted. Normally vote damage is 50% to 200% of current yes votes if there are only one or two products up for approval. This causes a delay in product submission success in reaching the market of from months to years. While this could be expected of criticism, over a half dozen accusations of theft had to be moderated from individuals after this video was published, these individuals assume they knew something that not enough research had been performed on. With the high percentage of market share owned by The Distributor and considering Green Light being the only way to submit products through to that platform, interference of this magnitude has become extremely detrimental to The Plaintiff’s success.

INCIDENT CAUSING LOST PRODUCT DAMAGE

36. The Article and the statements Tweeted by The Defendant caused a Skype conversation between the Plaintiff and The Distributor. The Defendant makes all the accusing statements with the intent of depicting The Plaintiff in a malicious

and defamatory manner, in reckless disregard for truth, and with negligence of not performing proper research as would be required of any normal person in regards to duty of care. The Article convinces the public and The Distributor that The Plaintiff is guilty of multiple false accusations.

37. During the Skype conversation on October 13, 2015 with The Distributor representatives Conor Malone and Tom Giardino, The Plaintiff was told that The Distributor was going to stop doing business with the Plaintiff. All of the Plaintiff's games were to be removed from sale, 8 current products, 1 pack, and 10 current greenlight games. Tom Giardino and Conor Malone had already disabled the Plaintiff's developer account and were in the process of removing all of the Plaintiff's products which would destroy all of the Plaintiff's income when the Plaintiff begged The Distributor not to delete the Plaintiff's income and that the Plaintiff would give all of the Plaintiff's current future products on Greenlight up to avoid losing everything. The Plaintiff managed to convince The Steam Representative, Tom, that The Plaintiff had not done anything illegal and The Plaintiff was a victim of false statements. Tom Giardino accepted this sacrifice. This sacrifice was made under extreme duress as The Plaintiff was about to lose over six thousand hours of coding and model work in addition to the products actually lost, all of The Plaintiff's income, and suffer extreme damage in the eyes of the public to the point of being unable to do business under The Plaintiff's good name.

RELIEF DEMAND

Attachment W shows product submissions and then product removal under duress. A confidential version of this attachment with monetary amounts will be filed under seal with The Steam Market Evaluation Report Exhibit. When the court finds in favor of The Plaintiff in the Complaint of Defamation for Libel Per Se and/or Libel Per Quod the Plaintiff requests the following relief judgement for the Counts contained in this Complaint in reference to both the Plaintiff's good name, the Plaintiff's business practice, emotional damage, financial damage, and severe financial distress, and for damage in the eyes of consumers. Damages related to The Incident defined with the Distributor are marked at the end with DISTRIBUTOR EVENT.

- Adjusted damages per Steam Market Evaluation Report \$2,223,000.

DISTRIBUTOR EVENT.

- Now that keys have returned in March of 2016 and available for The Plaintiff to advertise The Plaintiff's products, regular business routine is being attempted even with the harassment caused by The Defendant's actions. Reduced damages for each product that have now been resubmitted and moving forward. One such title has made it through at the time of this amendment - StarShip Nova Strike. For an adjusted loss example this would reduce damages by \$340 per month for each title that makes it through to publication. \$40,800 per product which can be determined at the time of case completion.

- The value of 2015 ownership 30% (\$146,500 x 10) multiplied by ten years for all current products due to continual accusations of theft, bad reviews, and attacks based off of The Defendant's publications: \$439,500
- Loss of \$1000 in advertising and 50,000 keys used to advertise the lost products these were current products that now these individuals will never purchase and no marketing benefit was gained due to the losses. Approximately 400 hours of marketing and advertising time and user damage from events. Having to start over on a new website to market products which is now abused by some of the upset users to actually apply product damage due to the controversy created by The Defendant's actions \$92,000. DISTRIBUTOR EVENT.
- 4 Month loss of key access (this has been restored by The Distributor as of the end of February 2015) to existing products limiting ability to advertise current and new products during critical market time: \$661,775. Damage realized by having to change from high output of lower cost products to one long term product that was initially damaged by The Defendant's subscriber's. Amended description as a more accurate view of losses has come to The Plaintiff's attention since initial filing. This could be significantly greater once market figures are in for bundle offerings on the distributor's site and may need re-evaluation within the next two months. DISTRIBUTOR EVENT.
- Time loss dealing with this case and research involved including the almost 1200 hours the Plaintiff spent performing research on law to represent appropriately in court (this reduced game production output by a minimum of five titles putting

the Plaintiff in a worse financial position). \$800,000. Amended breakdown: First 5 years for 5 titles \$475,000, Second 5 years for 5 titles \$237,500, and 1200 hours (current) at \$100 per hour \$120,000 for a total of: \$832,500.

- For increased difficulty (if ever) of getting a job related to the Gaming industry which has been a goal of The Plaintiff since beginning game design and using the marketing, programming, and game design experience learned and studied by The Plaintiff to create, 10 years of employment at a senior programming position this is added to reputational damage. The Plaintiff can now never get a job using The Plaintiff's good name in the gaming industry with a triple A level company without jeopardizing that company's reputation: \$1,250,000 direct position related damages. The Plaintiff has a history of earning in excess of 80 to 97 thousand a year in an economically depressed area.
- Emotional and financial distress including extreme financial strife resulting in loss of quality of life, loss of time to visit with family, immediately upon libel striking, including missing several important family events that will be unrecoverable. Emotional, mental, and financial strain on The Plaintiff. For many months the first thing The Plaintiff had to do every morning was look and see if The Defendant had posted another video or article that would cause some form of damage to The Plaintiff. This created a constant sense of dread and misery for over a year to The Plaintiff: \$2,000,000. This could increase as the case moves onwards due to publicity in The Plaintiff's market.

- Long term costs of time and effort to recover The Plaintiff's name and deal with defamation locations across the net for the rest of The Plaintiff's life. \$2,000,000.
- Punitive damages in the amount of \$5 million to discourage The Defendant, and all others that followed suit with The Defendants actions, from performing similar actions in the future. A minimum of 20 other former victims such as The Plaintiff have been singled out and destroyed for profit in a manner which replaces their copyright created material with a video from The Defendant while using the target's content. The Plaintiff has increased this request to deter The Defendant and others from doing this to developers such as The Plaintiff.
- Apologies in place of every offending article and video for a period of no less than 5 years. An apology video in the primary youtube location on The Defendant's media channels front for a period of no less than 5 years.
- An Injunction to stop and desist coverage of The Plaintiff, anyone working with The Plaintiff's company, and The Plaintiff's company itself by The Defendant for a period of no less than 10 years.
- Total Adjusted Relief Request: \$15,498,775 minus adjustment from bullet 2 upon case close.

RESPECTFULLY SUBMITTED this 11th day of April 2016

By: 
James Oliver Romine Jr. Pro Se.

12494 Ironwood Dr.
Yuma, Arizona 85367
jromine2445@gmail.com
928-276-1844


CERTIFICATE OF SERVICE

I hereby certify that on April 11, 2016, I caused this document to be sent by certified mail through the US Postal System to:

HARTMAN TITUS PLC
Bradley P. Hartman
John D. Titus
7114 E. Stetson Drive, Suite 205
Scottsdale, Arizona 85251-3250
Attorneys for Defendant

AND, James Nicholas Stanton
1004 Riverchase North Dr.
Brandon, Mississippi 39047
Defendant

AND, an Original for filing with The Court
With a courtesy copy:
United States District Court District of Arizona - Phoenix Division
Sandra Day O'Connor U.S. Courthouse, Suite 130
401 West Washington Street, SPC 1
Phoenix, AZ 85003-2118

By: 
James Oliver Romine Jr. Pro Se.
12494 Ironwood Dr.
Yuma, Arizona 85367

jromine2445@gmail.com
928-276-1844

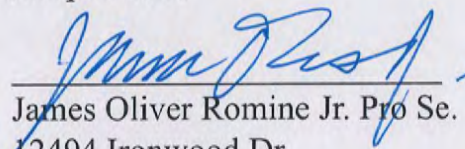
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

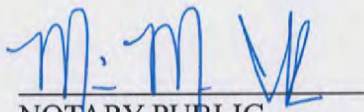
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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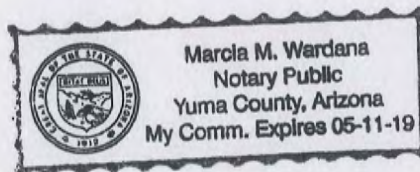
I James Oliver Romine Jr, depose and state that Attachment A is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

RESPECTFULLY SUBMITTED this 11th day of April 2016


James Oliver Romine Jr. Pro Se.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 11th day of April 2016.


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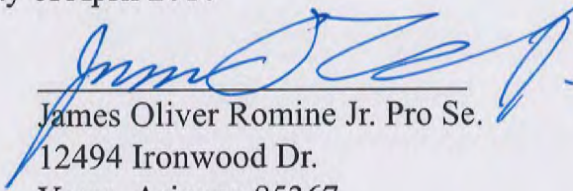
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**


<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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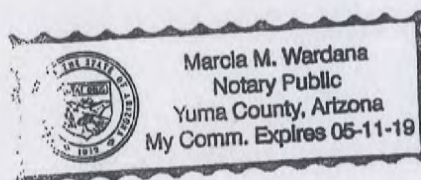
I James Oliver Romine Jr, depose and state that Attachment B is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

RESPECTFULLY SUBMITTED this 11th day of April 2016


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12494 Ironwood Dr.
Yuma, Arizona 85367

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You can watch video footage of *Devil's Share* and *Galactic Hitman* by clicking those prior links – they carry all the classic hallmarks of a Digital Homicide production. The assets are all store-bought, they're both hideous to look at, interactively generic, unfinished, and broken in some significant way. The only difference is the rebranding of the developer – surely a response to the fact that James and Robert Romino know their prior company's name is mud on Steam these days.

It's also worth noting that *Galactic Hitman*'s artwork has been taken from elsewhere, just like the initial art for *The Slaughtering Grounds* was. You can see the original imagery here, which Faker-ECC may have purchased from Shutterstock. Does DH even *have* a single artist?

[Note: Initially I suggested Digital Homicide just took the image from a Deviantart artist without permission, not knowing it was also sold on Shutterstock. The text has been edited to reflect this.]

Attachment B

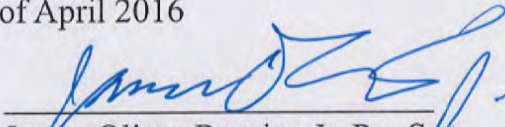
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

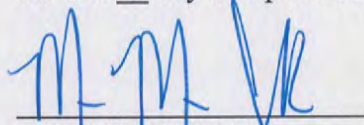
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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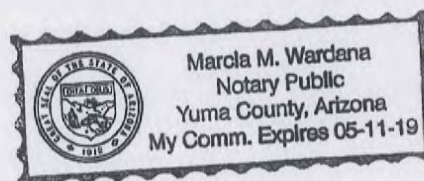
I James Oliver Romine Jr, depose and state that Attachment C is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

RESPECTFULLY SUBMITTED this 11th day of April 2016


James Oliver Romine Jr. Pro Se.
12494 Ironwood Dr.
Yuma, Arizona 85367

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United States

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Attachment C

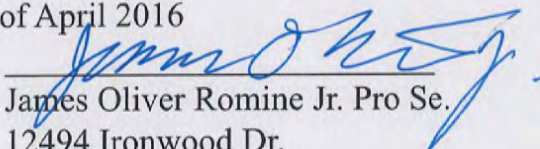
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

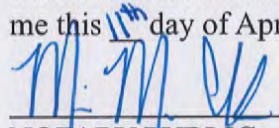
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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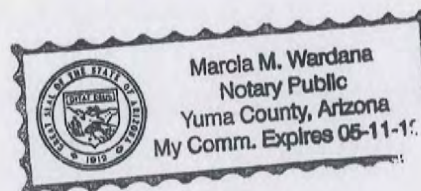
I James Oliver Romine Jr, depose and state that Attachment D is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

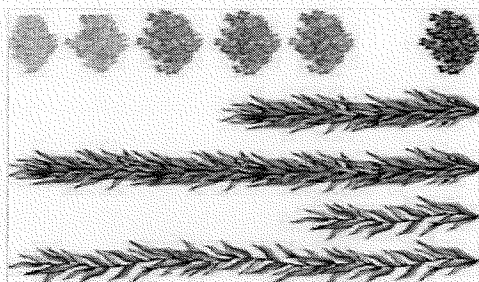
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James Oliver Romine Jr. Pro Se.
12494 Ironwood Dr.
Yuma, Arizona 85367

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me this 11th day of April 2016.


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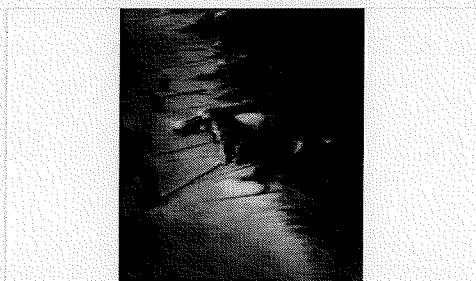




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9/2/15

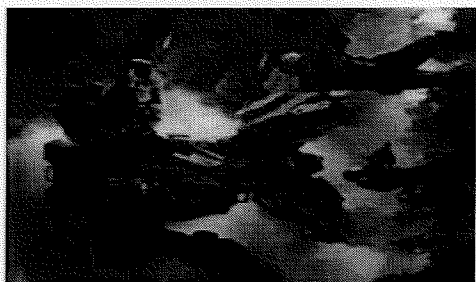
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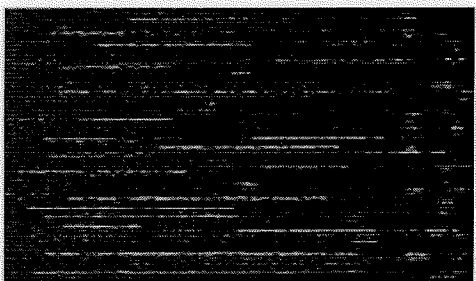
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Standard License



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9/4/15

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Attachment D

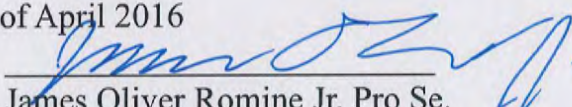
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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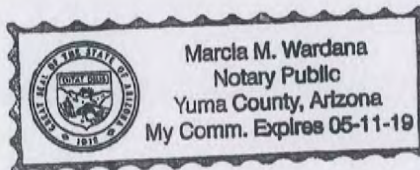
I James Oliver Romine Jr, depose and state that Attachment E is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

RESPECTFULLY SUBMITTED this 11th day of April 2016

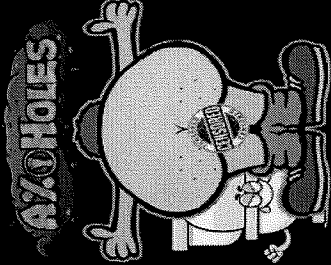

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12494 Ironwood Dr.
Yuma, Arizona 85367

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me this 11th day of April 2016.


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← C steamcommunity.com/sharedfiles/filedetails/discussions/594817170



Moderator Tools

Start a New Discussion

Subscribe to Forum

Discussions Rules and Guidelines

YOUR FORUM ACCOUNT

Post History

Community Moderation Messages

Showing 1-15 of 15 entries

Let's Talk Lawsuit	Mar 24 @ 9:40am	0
Beta Discussion	Mar 24 @ 7:42am	62
You again?	Mar 15 @ 9:33am	0
Jin Sterling Video Discussion	Mar 15 @ 8:48am	0
why should i play this game instead of agario	Mar 2 @ 11:45am	8
In less than 2 hours, with a US budget...	Jan 12 @ 8:46am	1
Are you even trying anymore?	Jan 11 @ 10:46pm	5
Is this created for small children?	Jan 11 @ 8:10pm	0
Stock "Assets" + stolen agario engine = this	Jan 10 @ 4:46pm	105
Questions to Digital Homicide	Jan 10 @ 8:27am	0
Discuss Jim Sterling Video On AZ@holes	Jan 9 @ 7:02am	0
Anyone tested this game from itch.io to see if its free from virus	Jan 9 @ 2:44am	5
STEAM ITS GONA HAPPEN!!	Jan 8 @ 7:55pm	0
Senen	Jan 8 @ 9:06am	0
Its like Agario with anuses	Jan 8 @ 2:22am	4

Showing 1-15 of 15 entries
Per page: 15 30 50

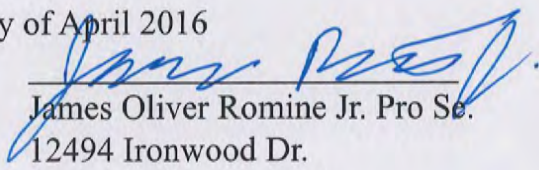
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

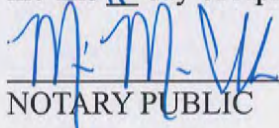
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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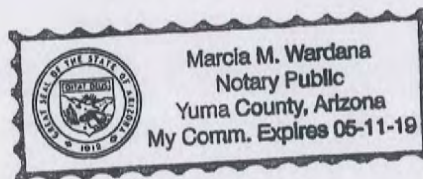
I James Oliver Romine Jr, depose and state that Attachment F is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

RESPECTFULLY SUBMITTED this 11th day of April 2016


James Oliver Romine Jr. Pro Se.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 11th day of April 2016.


NOTARY PUBLIC



When you can name yourself literally *anything* on Steam, it's impossible to know who is a legitimate developer and who isn't, as we've seen with the case of Faker-ECC. Apparently you don't need to prove your company's legitimacy or even *existence*, since it's all based on usernames. Here, we've seen it lead to potential legal trouble for the folks who rebranded and accidentally defamed a completely different studio.

Attachment F

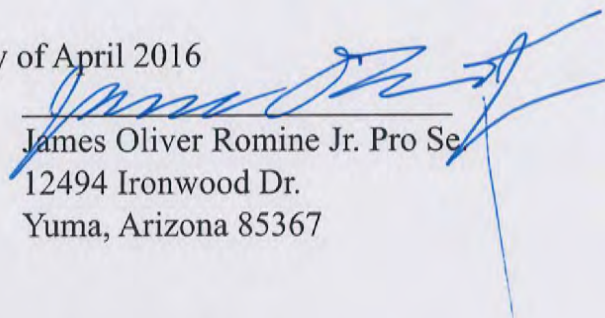
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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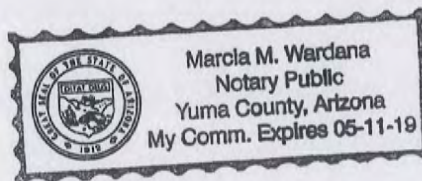
I James Oliver Romine Jr, depose and state that Attachment G is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

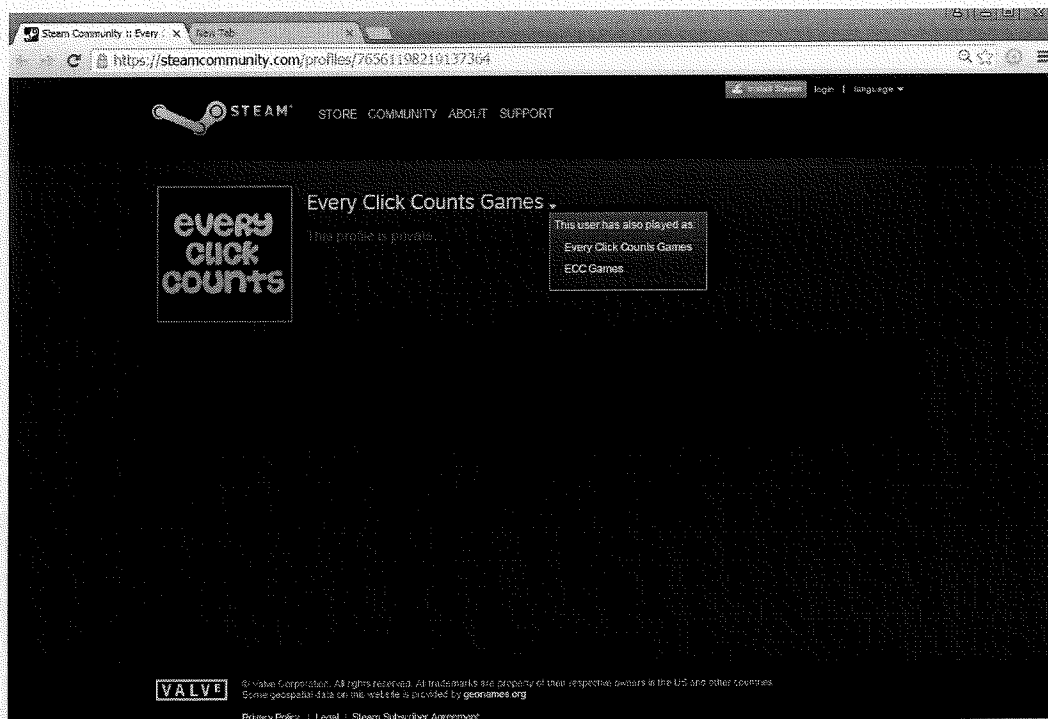
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James Oliver Romine Jr. Pro Se
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
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Attachment G

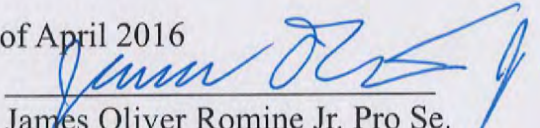
James Oliver Romine Jr. Pro Se Litigant
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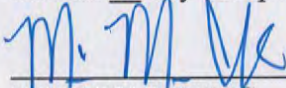
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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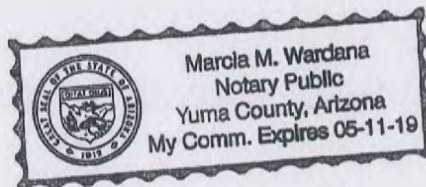
I James Oliver Romine Jr, depose and state that Attachment H is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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12494 Ironwood Dr.
Yuma, Arizona 85367

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[illegible]

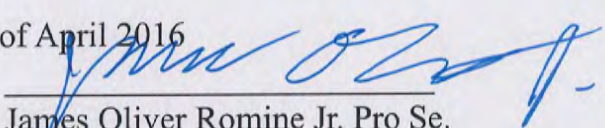
James Oliver Romine Jr. Pro Se Litigant
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Yuma, Arizona 85367
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jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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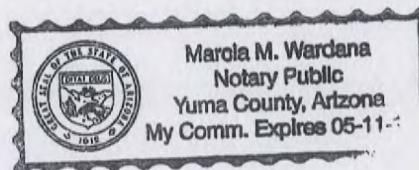
I James Oliver Romine Jr, depose and state that Attachment I is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

RESPECTFULLY SUBMITTED this 11th day of April 2016


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12494 Ironwood Dr.
Yuma, Arizona 85367

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When you can name yourself literally *anything* on Steam, it's impossible to know who is a legitimate developer and who isn't, as we've seen with the case of Faker-ECC. Apparently you don't need to prove your company's legitimacy or even *existence*, since it's all based on usernames. Here, we've seen it lead to potential legal trouble for the folks who rebranded and accidentally defamed a completely different studio.

Someone on Twitter asked me how they "got away" with calling themselves ECC Games. The fact is, they didn't have to "get away" with anything, at least not as far as Steam is concerned. Once again, Valve's lack of oversight makes it easy to just call yourself ECC Games, regardless of who is *actually* allowed to trade under that name.

Digital Homicide's official channels have maintained radio silence for months, seeming to operate solely through these sockpuppet companies. Being as sly as the Wet Bandits, however, it hasn't taken long for the Internet to dig up their latest sleazy shenanigans.

At some point, this "studio" is going to have to realize it is neither talented enough to become a producer of good games, nor clever enough to trick us into believing it is.

That's not going to happen today though, and its recent chicanery may lead it into very real legal trouble.

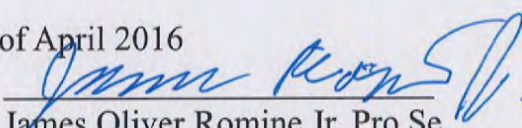
James Oliver Romine Jr. Pro Se Litigant
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

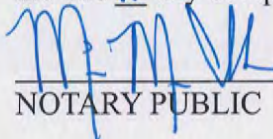
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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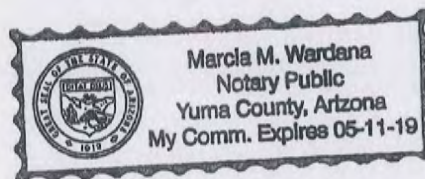
I James Oliver Romine Jr, depose and state that Attachment J is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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12494 Ironwood Dr.
Yuma, Arizona 85367

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Anyway, it's time to get to the really juicy part. Remember when I said that *Devil's Share* and *Galactic Hitman* were published under the name ECC Games? Well, there actually *is* an ECC Games, and it sure as shit wasn't the company uploading crap games to Steam.

A Polish mobile game company by the name of ECC Games reached out to me via email explaining it has absolutely no link to Digital Homicide, and its claim most certainly seems to check out. Its own website features a whole host of mobile games, along with a full-fledged team of Polish developers. It also has a Twitter account which, prior to now, has no history of mentioning either *Devil's Share* nor *Galactic Hitman*.

"We would like to inform that we are not designers nor producers of *Galaxy Hitman* nor *Devils Share*, games that have been published on Steam," said ECC producer Dorota Muzynska. "We probably fell victim to a people previously known as Digital Homicide. We have already taken legal actions aimed at ceasing infringement of ECC GAMES rights."



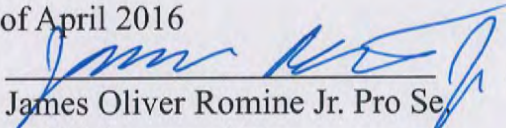
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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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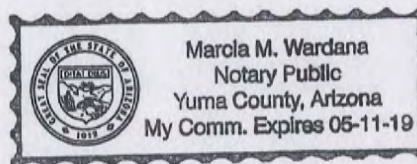
I James Oliver Romine Jr, depose and state that Attachment K is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

RESPECTFULLY SUBMITTED this 11th day of April 2016


James Oliver Romine Jr. Pro Se
12494 Ironwood Dr.
Yuma, Arizona 85367

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 Piotr Wątrudki CEO Game Producer	 Jakub Traczyk Technical Director	 Jakub Jamol Game Artist	 Marcin Macharzewski Programmer
 Hubert Bibrowski Game Producer Engineer Engineer Engineer	 Michał Tomaka Engineer Engineer Engineer	 Piotr Kowalski Programmer	 Piotr Roswag Game Producer
 Jerzy Sokółowski Game Producer	 Dorota Muzynska Game Producer	 Rafał Majzer Technical Support	 Daria Wiermańska-Spala Artist

ADDRESS

ECG GAMES SP. Z O.O.
NIP / VAT: PL525389844
REGON: 147481416
KRS: 000049777
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Zakładowego 1 000 000,00 ZŁ

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b2b@ecgames.com

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5:14 PM
2016

Attachment K

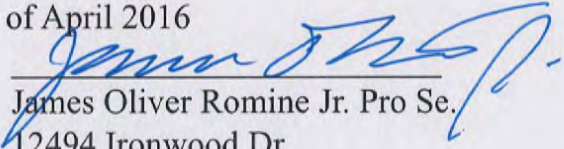
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

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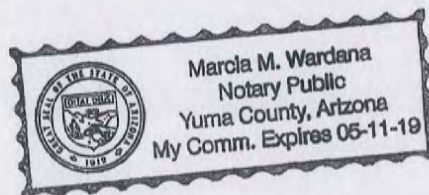
I James Oliver Romine Jr, depose and state that Attachment L is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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REGON: 147481416
KRS: 0000540727
Wysokość kapitału
zakładowego 800000,00 ZŁ

Office:

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POLAND

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Attachment L

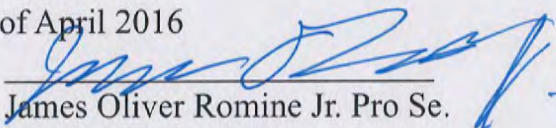
James Oliver Romine Jr. Pro Se Litigant
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928-276-1844
jromine2445@gmail.com

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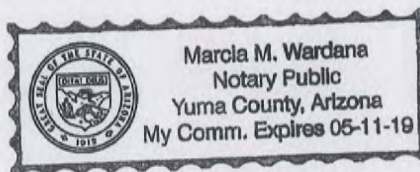
I James Oliver Romine Jr, depose and state that Attachment M is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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James Oliver Romine Jr. Pro Se.
12494 Ironwood Dr.
Yuma, Arizona 85367

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OHIM Trademark	
010470339 - Roll in the hole	
Status Registered (2012-10-05)	
(51) Date of the registration	2012-10-05
(210) Serial number of the application	010470339
(220) Date of filing of the application	2011-12-06
(270) Language(s) of the application	PL
(180) Expected expiration date of the registration renewal	2021-12-06
(541) Reproduction of the mark where the mark is represented in standard characters	Roll in the hole
(550) Indication relating to the nature or kind of mark	Individual
(550) Indication relating to the nature or kind of mark	Word
(311) Name and address of the applicant	Piotr Wiatnicki Lublin - Troszka (05-000) PL
(740) Name and address of the representative	JARZYNKA WSPOLNICY KANCELARIA PRAWNO-PATENTOWA Warszawa (00-105) PL
(521) Indication to the effect that the mark has acquired distinctiveness through use in trade	Since
(311) The International Classification of Goods and Services for the Purposes of the Registration of Marks (Nice Classification) and the list of goods and services classified according thereto	
9	Scientific, nautical, surveying, photogrammetric, optical, weighing, measuring, signalling, checking (supervision), life-saving and teaching apparatus and instruments, Apparatus and instruments for conducting, switching, transmitting, accumulating, regulating or controlling electricity, Apparatus for recording, transmission or reproduction of sound or images, Magnetic data carriers, recording discs, Automatic vending machines and mechanisms for coin-operated apparatus, Cash registers, calculating machines, data processing equipment and computers, Time-dividing apparatus, Recorded computer software, computer game programs, downloadable software, recorded computer programs, magnetic data media
28	Games and playthings, Gimmicks and sporting articles not included in other classes, Decorations for Christmas Trees and Christmas, Gymnastic and sporting articles not included in other classes, Play balloons, swimming pools (play articles), explosive balloons (Christmas crackers), Skateboards, playing cards, counters for games, dice, dices, puppets, toy masks, teddy bears, push toys, puzzles, mobiles (toys), board games
41	Education, Providing of training, Entertainment, Sporting and cultural activities, Games services provided online (via computer networks), arranging competitions (education or entertainment)

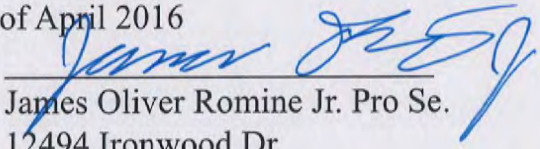
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

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FOR THE DISTRICT OF ARIZONA**


<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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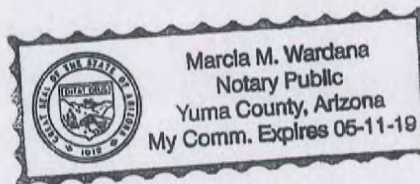
I James Oliver Romine Jr, depose and state that Attachment N is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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12494 Ironwood Dr.
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Jim Sterling @JimSterling

TWEETS 72.6K FOLLOWING 499 FAVORITES 143 [Follow](#)

Jim Sterling @JimSterling · Sep 24
 Finally got a gameplay video of Underfall up! youtu.be/2HjQymY8EM
 View media

Jim Sterling @JimSterling · Sep 24
 Yes. Yes yes yes. youtu.be/L_PAE7U3IMs
 View media

Jim Sterling @JimSterling · Sep 24
 Cheers! Fixed that.

simon @simonpops
 @JimSterling the artist you linked to mentioned the pub & up on shutterstock. Der might have bought the rights

Jim Sterling @JimSterling · Sep 24
 I wrote an article on everything we know about the Digital Homicide/ECC Games weirdness. theinquisition.com/2015/09/digitala...

RETWEETS 57 REPLIES 158
 5:05 AM · 24 Sep 2015 · Details

Enagon's Advocate @Enagon's Advocate · Sep 24
 @JimSterling Pocom required for reading?

Troy Goodfellow @TroyGoodfellow · Sep 24
 @JimSterling These guys

4Dorbz Butlighter @4DorbzButlighter · Sep 24
 @JimSterling i think it's memes

4:54 PM
 9/23/2015

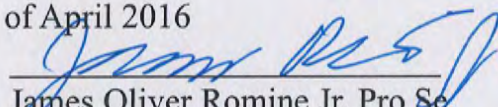
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12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

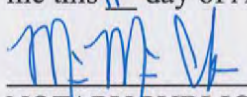
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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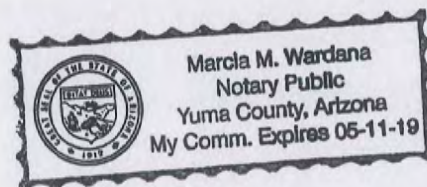
I James Oliver Romine Jr, depose and state that Attachment O is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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status/647005008819437568

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Jim Sterling @JimSterling [Follow](#)

According to the email, this ECC Games is pursuing legal action against Digital Homicide for using its name. Not enough popcorn on Earth.

RETWEETS 59 LINES 392

4:09 AM - 24 Sep 2015

Mhykul @Spancoolt · 24 Sep 2015
@JimSterling The plot thickens..

Nick Piers @NickPiers · 24 Sep 2015
@JimSterling I've said it once, I'll say it again: Digital Homicide is the gift that keeps on giving. Because they're idiots.

Jonathan McCabe @Moist_plunge · 24 Sep 2015
@JimSterling HIT THE LEVER

Robert Koganov @TH3R34P3R · 24 Sep 2015
@JimSterling Oh this is going to be a good episode when you make it lol

John Sinderman @JSinderman · 24 Sep 2015
@JimSterling I can't even. Can we be sure Digital Homicide isn't some sort of brilliant performance art troupe?

Show more

Attachment O

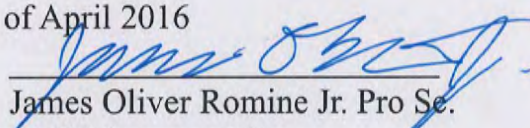
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12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

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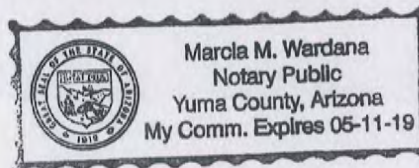
I James Oliver Romine Jr, depose and state that Attachment P is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

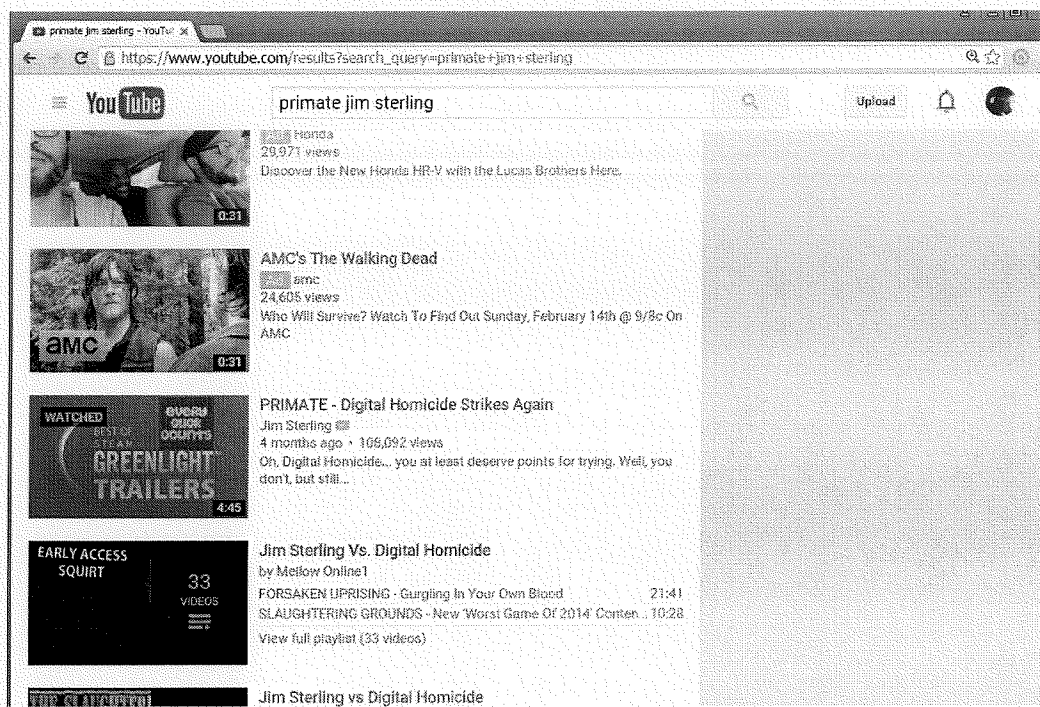
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Attachment P

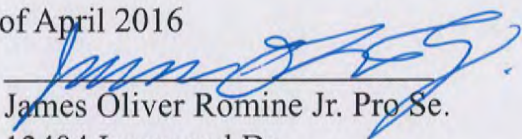
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Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

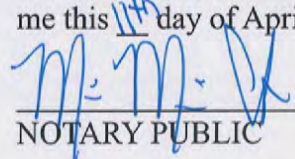
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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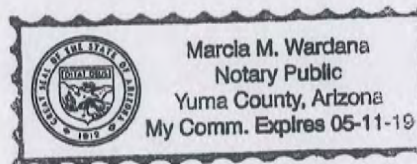
I James Oliver Romine Jr, depose and state that Attachment Q is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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James Oliver Romine Jr. Pro Se.
12494 Ironwood Dr.
Yuma, Arizona 85367

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me this 11th day of April 2016.


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Attachment Q

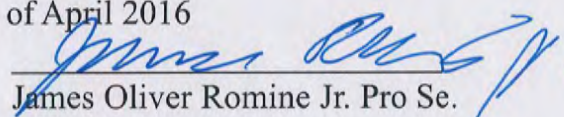
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

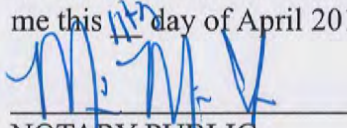
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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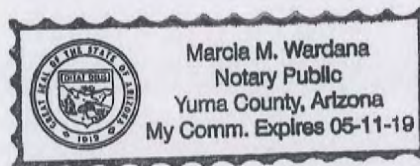
I James Oliver Romine Jr, depose and state that Attachment R is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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12494 Ironwood Dr.
Yuma, Arizona 85367

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Do you think UN regulation of the internet is really a bad thing? Given how poorly many countries handle their legal systems over the internet (particularly America), wouldn't it be a benefit if they just revised the agreement?

The UN thing is so amazingly overblown. It will not "censor the Internet" and the things I've read about Anita Sarkeesian having the power to get people arrested is unbelievably delusional. I think it's a good thing that the UN is looking into tackling online abuse and harassment, and I'd say the same thing of Google's recent efforts too. The only people who have anything to be afraid of there are, well, abusers and harassers.

Anybody likening it to SOPA and PIPA are being ludicrous, and showcasing their complete lack of aptitude for the politics they repeatedly dabble in while claiming they hate politics being involved in everything.

2 days ago

6 people like this

Jim, why do you feel it was necessary to out ECC games as Digital Homicide? It's clear that with the new identity, these guys wanted to start anew and leave the past behind. They can still be criticized, sure, but I think it's spiteful to bring their past reputation into it if it's not relevant.

Yeah it was, because Digital Homicide is more than just a bad developer. It's had a history of shady and dishonest behavior, behavior it was continuing under its new name. The very fact it was damaging the reputation of another company entirely is bad enough, to say nothing of its continued efforts to push games through Greenlight via unscrupulous means.

I will not deny the pleasure I take in sticking it to them, but their name is mud for a reason, and people deserve to know who's really selling them products.

2 days ago

8 people like this

Were you going to share the reason why Moo Tech's take down failed? I read that on twitter earlier and haven't found any follow-up.

I will, yes, but currently it's not something I can share. I'm chomping at the bit to talk about it, and will do as soon as I can. It's potentially Jimquisition material, to boot.

2 days ago

1 person likes this

Considering the decision by Ubisoft to include a trans person in the new AC, I'm guessing the new Jimquisition is going to be talking about representation of social and ethnic groups in video games, am I close? (I assume ethnic groups because of the picture of Vass)

It is more distinctly tied to Vass and similar things.

2 days ago

2 people like this

Isn't it funny how some people can't comprehend that a male might be interested in female rights so they have to come up with a "his wife/gf makes him say that!!!" story just to prevent their narrow minds from exploding? Good thing none of that is real.

Step 1: Find a woman to blame.

Step 2: Dribble.

2 days ago

4 people like this

not a question but in response to the question about nitpick theater and audience enjoying it.

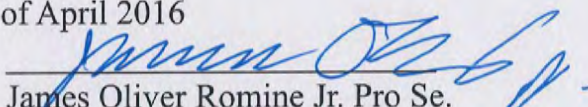
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jromine2445@gmail.com

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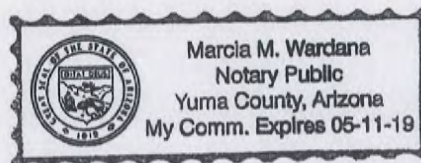
I James Oliver Romine Jr, depose and state that Attachment S is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

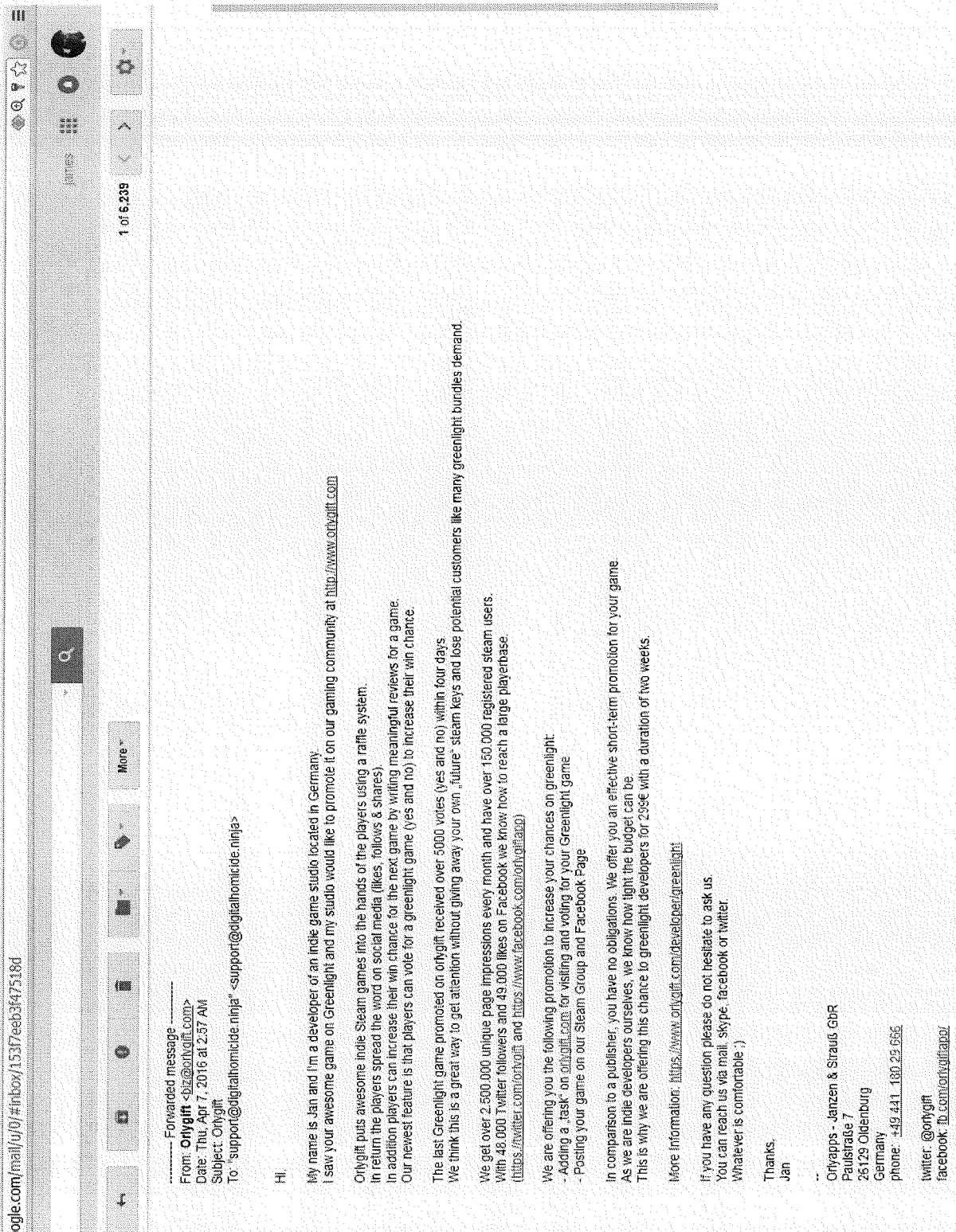
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Attachment S

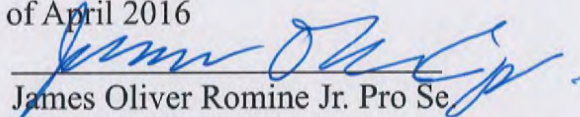
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jromine2445@gmail.com

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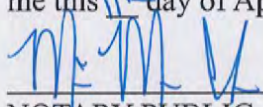
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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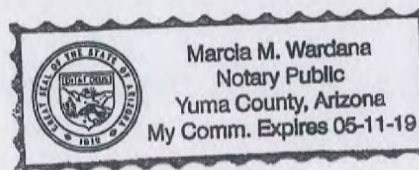
I James Oliver Romine Jr, depose and state that Attachment T is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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James Oliver Romine Jr. Pro Se
12494 Ironwood Dr.
Yuma, Arizona 85367

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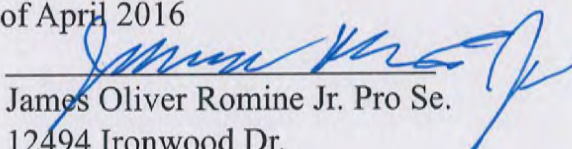
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

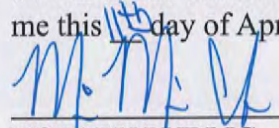
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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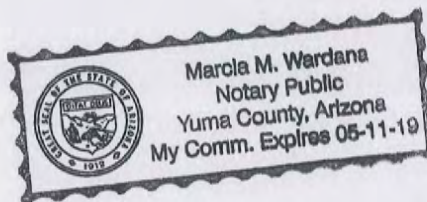
I James Oliver Romine Jr, depose and state that Attachment U is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

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12494 Ironwood Dr.
Yuma, Arizona 85367

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steamcommunity.com/app/393390/discussions/#p2

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Cat Simulator

All Discussions Screenshots Artwork Broadcasts Videos News Guides Reviews

Showing 16-30 of 63 entries

1 2 3 4 5 6 >

	False Positive reviews	Feb 15 @ 9:46am	0
	Jim Sterling 2nd Video	Feb 15 @ 7:26am	0
	Assets used in this game are used ILLEGALLY!	Feb 15 @ 8:46am	4
	This exists because?	Feb 15 @ 1:27am	0
	inquisition skewering	Feb 14 @ 7:32pm	0
	Hay now...	Feb 14 @ 6:16pm	0
	THERE IS NO CATS IN THIS GAME!	Feb 14 @ 1:43pm	0
	"Project CATS" second try	Feb 14 @ 8:02am	0
	75% positive reviews?	Feb 14 @ 8:42am	0
	who voted for this?	Feb 14 @ 4:31am	7
	How much money was spent paying for positive reviews?	Feb 14 @ 2:02am	4
	What they're saying is...	Feb 14 @ 1:10am	0
	he didnt even give me a ban reason	Feb 13 @ 11:20pm	7
	can't find project cats on the store	Feb 13 @ 8:10pm	0
	Opinions please.	Feb 15 @ 7:46pm	5

Showing 16-30 of 63 entries

Per page: 15 30 50

1 2 3 4 5 6 >

Start a New Discussion

General Discussions

Trading

Discussions Rules and Guidelines

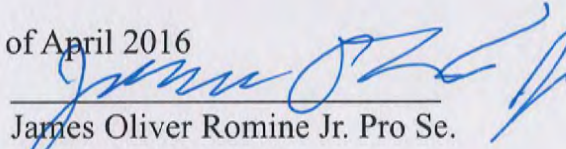
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

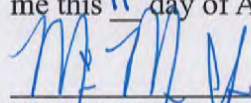
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
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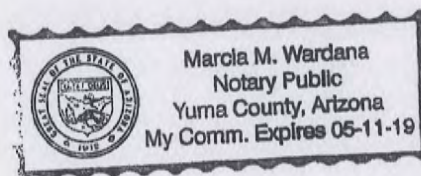
I James Oliver Romine Jr, depose and state that Attachment V is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

RESPECTFULLY SUBMITTED this 11th day of April 2016


James Oliver Romine Jr. Pro Se.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 11th day of April 2016.


NOTARY PUBLIC





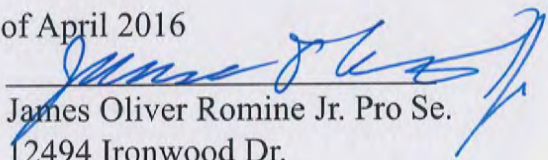
James Oliver Romine Jr. Pro Se Litigant
12494 Ironwood Dr.
Yuma, Arizona 85367
928-276-1844
jromine2445@gmail.com

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

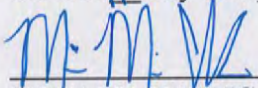
<p>JAMES OLIVER ROMINE JR. Plaintiff</p> <p>v.</p> <p>JAMES NICHOLAS STANTON Defendant</p>	<p>Case No.: 2:16-cv-00604-JJT</p> <p>AFFIDAVIT OF VERIFICATION</p> <p>TRIAL BY JURY: No</p>
--	---

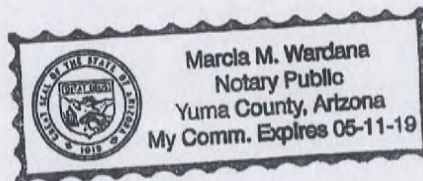
I James Oliver Romine Jr, depose and state that Attachment W is true and correct to the best of my knowledge, information, and belief and in support of the factual allegations contained within The Complaint.

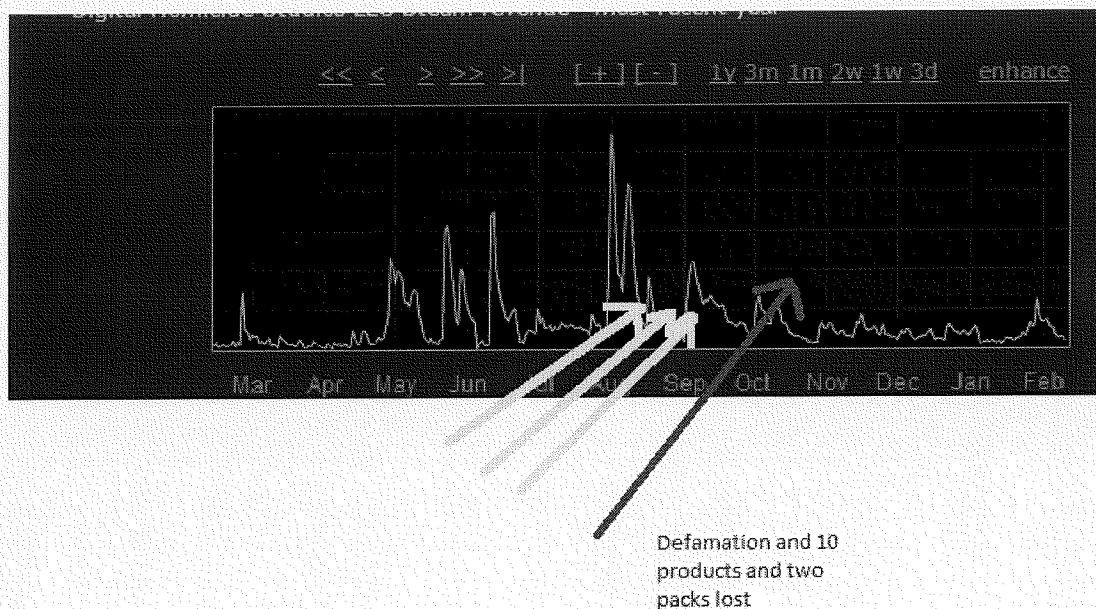
RESPECTFULLY SUBMITTED this 11th day of April 2016


James Oliver Romine Jr. Pro Se.
12494 Ironwood Dr.
Yuma, Arizona 85367

Sworn to and subscribed before
me this 11th day of April 2016.


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The 3 White arrows express the addition of products to submission stage by Every Click Counts and The Plaintiff's other Trade Names. This is initial standard product staging before being incorporated.

The Grey Arrow indicates the loss of these products and advertising efforts.

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<input type="checkbox"/> Return Receipt (electronic)	\$	
<input type="checkbox"/> Certified Mail Restricted Delivery	\$	
<input type="checkbox"/> Adult Signature Required	\$	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$	

Postage \$ 895

Total Postage and Fees \$ 1325

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7015 3010 0100 0270 5465

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<input type="checkbox"/> Certified Mail Restricted Delivery	\$	
<input type="checkbox"/> Adult Signature Required	\$	
<input type="checkbox"/> Adult Signature Restricted Delivery	\$	

Postage \$ 895

Total Postage and Fees \$ 1325

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